

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNI-SCREW EUROPE BV,

Plaintiff,

v.

**UNISCREW WORLDWIDE, INC. and
STEWART TIPPING,**

Defendants.

No. 07 CV 7033 (PKC)(AJP)

PLAINTIFF'S MOTION TO FILE EXHIBIT UNDER SEAL

Plaintiff Uni-Screw Europe BV ("BV") hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for an order to file under seal Exhibit A to BV's Complaint, which was filed in the captioned case on August 6, 2007.

Exhibit A to the Complaint (a copy of which is attached only to the courtesy copy of this motion) is a license agreement executed between Plaintiff BV and Defendants UniScrew Worldwide, Inc. and Mr. Stewart Tipping in both his official and individual capacity. Pursuant to the terms of the license agreement itself, disclosure of the contents of the license agreement may violate the terms of that agreement, and as such Plaintiff respectfully requests that the Court file this Exhibit A under seal.

At this time, there is no protective order in place, as all parties have not yet been served, and discovery has not yet commenced. When all parties have been served and discovery commences, BV will make a good faith attempt to enter into a protective order with Defendants to govern the treatment of confidential materials in this action, and should that fail, BV will request the Court's assistance in entering such an order.

Dated: August 9, 2007

Respectfully submitted,

/s/ Sarah C. Hsia
Sarah Hsia (SH-1030)
Natalie Clayton (NC-6954)

ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
(212) 210-9400
Attorneys for Plaintiff

Of Counsel:

Bruce J. Rose (*admitted in North Carolina*)

Brian F. McMahon (*admitted in New York & California*)

ALSTON & BIRD LLP

101 S. Tryon St., Ste 4000

Charlotte, NC 28280-4000

(704) 444-1000